

Good Morning:

I hope this is adequate for presenting comments relative to the proposed Joint Board regulations and actually Joint Board policy relative to continuing education credit for participation in the examination process.

The regulations (existing and proposed) do not specify the number of hours granted for participation on the Advisory Committee, the writing committee chairs and item writers, and pretesters. They do however limit the number of hours for all but the Advisory Committee to 50% of the required number of hours. I would like to discuss each of these.

My comments below are based on what I know from 20+ years of involvement with the enrollment examinations and, because of that, the effort put in by participation on all three of the above and the legitimate continuing education gained by that participation compared to what is gained by attending seminars/conferences. Very simply, I find it very difficult to believe that an individual can benefit as much by attending a three day seminar compared to the benefit from writing and/or reviewing examination questions.

Looking first at the AC, the regulations say "to the extent that the Joint Board considers warranted by the service rendered". Since we are currently granted 12 hours per year, that is enough to satisfy the three year requirement if the member is on the AC for the full three years. To get that 12 hours credit, a member has to attend six days of meetings and spend significant time prior to the meetings reviewing questions. Also, in order to get full credit for a three year cycle currently, a member has to be on the AC for the entire three years. I would like to see this increased to 18 hours per year. Note that this 18 hours is less than someone can claim from a three day seminar and this is six days of meetings (plus the outside time).

Turning next to the writing committees, the regulations say "to the extent the Joint Board determined suitable". It continues that "Such credit may not exceed 50 percent of the continuing professional education requirement for the applicable enrollment cycle". Currently, item writers are granted a maximum of 9 hours and the chairs are granted 12 hours subject to the regulated 50% maximum.

I think that the hours and maximum are appropriate for participation on the EA-1 examination. However, I think they are inadequate for participation on the EA-2 examination (both segments).

As you know from your attendance at the recent EA-2(A) committee meeting, these two day meetings are intense. Over the years, actuarial members of the Joint Board have attended these meetings. I'm confident that they all would agree with that observation.

The item writers spend many hours outside (prior to) that meeting writing questions and reviewing questions written by others. They then attend this two day very intense meeting reviewing all the questions for eventual submission to the Advisory Committee.

When necessary, writers are asked to revise questions based on the review at the meeting. The chairs will then meet with me later on for a final two day review prior to submission to the Advisory Committee.

Further, the chairs attend two of the AC meetings (three days of meetings) when we are reviewing the questions.

I would like the 50% limit removed. I would also like the number of hours increased for writers to 12 and the chairs to 18.

One objection to this, in particular the elimination of the 50% limit, might be that the subject matter on a given segment is not broad enough. Obviously, participation on EA-2(A) gives the writers little on the topics in EA-2(B) and vice versa. However, when attending a seminar, EAs pick the sessions to attend and pick the ones which interest them and are relevant to their individual practices and they do not necessarily get broad based continuing education. Also, the reality is that some attendees at seminars are totally ignoring the presenters and are there strictly for the CE credit.

Finally, the pretesters. The 50% limit applies and they are currently granted 6 hours. They take the exam(s) at home, prepare comments, and then attend a one day meeting where the examination is finalized.

Similar to the situation with the EA-1 writing committee, I think these are adequate for the EA-1 pretest (if we pretest that exam in the future).

For EA-2 (both segments) however, I would like to see this increased to 9 hours without the limit. A pretester could not get the full 36 hours in a cycle by pretesting one of the two segments and would therefore have to pretest both segments (which I believe some do) to get full credit or get additional credit otherwise.

Elizabeth, I have never commented on proposed regulations and I hope this is adequate. If something more formal is needed, please let me know.

I would be pleased to present these thoughts in person at the January Joint Board meeting.

Thanks.

Carl

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